

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. S1-4:14CR00088 RWS (SPM)
v.	)	
	)	
TIMOTHY LAMONT RUSH,	)	
a/k/a "Professor,"	)	
	)	
Defendant.	)	

**CRIMINAL INFORMATION**

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Michael R. Reilly and Tiffany G. Becker, Assistant United States Attorneys for said District, and charges in accordance with Title 21, United States Code, Section 851(a)(1), as follows:

1. The above defendant is presently indicted on four counts in the above-entitled case with violations of Title 21, United States Code, Sections 846 and 841(a)(1) (as to Counts II, III, IV and V).

2. On or about August 16, 1999, in the Circuit Court of St. Louis City, Missouri, in Cause No. 22981-2989, defendant Timothy Lamont Rush pled guilty to the felony offense of sale of a controlled substance, cocaine base, a violation of Mo. Rev. Stat. § 195.211, for events occurring on August 5, 1998. On November 19, 1999, the Court sentenced defendant Rush to 15 years confinement in the Missouri Department of Corrections, with 120-day drug treatment. On or about February 6, 2003, the Court revoked Timothy Rush's probation and sentenced him to 15 years confinement in the Missouri Department of Corrections. Defendant Timothy Rush served

more than one year in prison for this offense. The pending offenses commenced within fifteen years of defendant Timothy Rush's release from prison.

3. Because of said prior serious felony drug conviction and the quantity of controlled substances (cocaine and heroin) charged in the instant superseding Indictment, the penalty range applicable to defendant, if convicted, is a mandatory term of not more than 15 years imprisonment, pursuant to Title 21, United States Codes, Sections 841(b)(1)(A)(ii)(II) and 841(b)(1)(A)(i). The United States seeks enhanced punishment for these offenses pursuant to Title 21, United States Code, Section 851.

4. A copy of the prior conviction documents for the above-referenced conviction is attached hereto as Exhibit 1.

WHEREFORE, said defendant, having previously been convicted of the crime of: (1) Sale of a controlled substance (cocaine base), a felony under Missouri Revised Statute § 195.211, the Government requests that the defendant, if convicted in this case, be sentenced pursuant to Title 21, United States Code, Sections 841(b)(1)(A)(ii)(II) and 841(b)(1)(A)(i).

I, Michael A. Reilly, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

1-29-19  
DATE

Michael A. Reilly  
MICHAEL A. REILLY, #43908MO  
Assistant United States Attorney

Subscribed and sworn before me this 29th day of January, 2019.

Gregory J. Lindsey  
Clerk, U.S. District Court

By: Maureen A. Laires  
Deputy Clerk

**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Michael A. Reilly

MICHAEL A. REILLY, #43908MO

TIFFANY G. BECKER, #46314MO

Assistant United States Attorneys